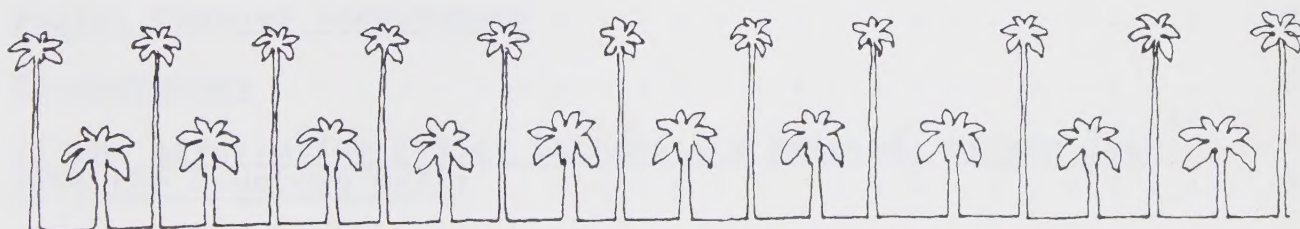


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City of Santa Monica General Plan Land Use and Circulation Elements

Issue Paper: The Downtown Summary



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City of Santa Monica General Plan Land Use and Circulation Elements Issue Paper The Downtown Summary

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TABLE OF CONTENTS

	<u>Page</u>
<u>SUMMARY OF THE ASSIGNMENT</u>	1
<u>INTRODUCTION</u>	1
<u>DESCRIPTION OF THE AREA</u>	2
<u>USE OF THIS REPORT</u>	2
<u>KEY ISSUES</u>	3
<u>SUMMARY OF KEY POLICY FINDINGS</u>	4
<u>SCENARIO I: CONTINUATION OF PAST POLICIES</u>	4
<u>Since That Time and Up to 1982</u>	4
<u>If Past Policies Are Continued, by the Year 2000 the</u> <u>Downtown Will:</u>	5
<u>SCENARIO II: THE COMMERCIAL AND INDUSTRIAL TASK</u> <u>FORCE PROGRAM</u>	6
<u>Policy Changes Recommended</u>	6
<u>Consequences</u>	6
<u>If the Recommended Task Force Policy Changes Are Adopted,</u> <u>by the Year 2000 the Downtown Will:</u>	7
<u>SCENARIO III: AN ALTERNATIVE</u>	8
<u>Policy Changes Recommended</u>	8
<u>Consequences</u>	8
<u>If the Alternative Policy Changes Are Adopted, by the Year</u> <u>2000 the Downtown Will:</u>	9
<u>ANALYSIS -- CONTINUATION OF PAST POLICIES</u>	10
<u>Previous Policy Recommendations</u>	10
<u>Since That Time and Up to 1982</u>	11

TABLE OF CONTENTS (Cont'd.)

	<u>Page</u>
<u>If Past Policies Are Continued, by the Year 2000</u> <u>the Downtown Will:</u>	12
<u>ANALYSIS -- THE COMMERCIAL AND INDUSTRIAL</u> <u>TASK FORCE PROGRAM</u>	14
<u>Policy Changes Recommended</u>	14
<u>Consequences</u>	15
<u>If Task Force Recommendations Are Adopted, by the Year 2000</u> <u>the Downtown Will:</u>	17
<u>ANALYSIS -- AN ALTERNATIVE</u>	18
<u>Policy Changes Recommended</u>	18
<u>Consequences</u>	18
<u>If the Alternative Policy Changes Are Adopted, by the Year</u> <u>2000 the Downtown Will:</u>	19
<u>ANALYSIS -- OTHER IMPACTS OF THE</u> <u>THREE SCENARIOS</u>	20
<u>APPENDICES</u>	
<u>APPENDIX I</u> -- SCENARIO #2 (CITY RESOLUTION #6385) SPACE DEMAND PROJECTIONS	
<u>APPENDIX II</u> -- DOWNTOWN PRO-FORMA AND ANALYSIS	
<u>APPENDIX III</u> -- SUMMARY COMPARISON OF SCENARIOS -- THE DOWNTOWN	

ISSUE PAPER 3: THE DOWNTOWN

SUMMARY OF THE ASSIGNMENT

INTRODUCTION

One of Santa Monica's great advantages as it proceeds to revise it's Land Use and Circulation Element is the City's recent history of very extensive public policy debates dealing with many of the issues that are central to decisions on future land use patterns. This high level of debate has helped to crystallize issues to a far greater degree than is usually true. Thus the premise underlying this paper is that citizen-government communication in Santa Monica has progressed to the point where effective citizen involvement and action now require a carefully documented analytic perspective on each of what are generally agreed to be the key issues for future land use. The purpose of this paper and the four others like it is to provide such a perspective.

In November the Consultants prepared a set of "research designs" for each issue paper. These set out the key issues which the Consultants thought had emerged in the City in it's past debates and discussions on land use policy in each of five geographical areas of the City:

- (1) The Industrial Corridor
- (2) The Downtown
- (3) The Highway Commercial Corridors
- (4) The Neighborhood Commercial Areas
- (5) The Oceanfront

This statement of the issues was discussed with community groups, business organizations and elected officials in the City and then revised in light of the comments made. These groups included the Santa Monica Chamber of Commerce, the Pico Neighborhood Association, the Concerned Homeowners of Santa Monica, the Ocean Park Community Organization and the Santa Monica Visitors and Convention Bureau. Each design also contained a plan for analyzing the key issues. That plan indicated that for each geographical area the papers are to report what the consequences are likely to be in the year 2000 of:

- The continuation of existing land use regulations in effect in April 1981 (Scenario 1),
- The set of regulations and policies proposed last year by the City's Commercial and Industrial Task Force and adopted by the City Council as Resolution 6385 (Scenario 2),
- An alternative set of policies proposed by the consultants (Scenario 3).

As required by the Planning Commission, the analysis of consequences is also to include an identification of the costs and benefits that may reasonably be expected to attach to the three different sets of policies with respect to six major City goals:

- (1) Assurance of adequate General Fund revenues for provision of City services.
- (2) Provision of employment opportunities for Santa Monica residents.
- (3) Support for existing Santa Monica businesses.
- (4) Maintenance of the City's housing stock.
- (5) Preservation and protection of Santa Monica's natural environment, including attention to traffic, parking and utility infrastructure.
- (6) Attention to problems of unemployment and underemployment.

DESCRIPTION OF THE AREA

These facts and figures are set forth below for the Downtown. The Downtown is the C-3 zoned square bounded by the Freeway, Palisades Park, Wilshire and Seventh Court. (In Scenario 3, the boundary is extended to Eighth Court.) The downtown area contains Santa Monica Place, the Santa Monica Mall and associated City parking structures, office buildings, a hotel and retail stores along Wilshire Boulevard, retail, office and residential uses along 2nd, 4th, 5th, 6th and 7th Streets, and hotels, restaurants, offices, apartment hotels and some retail uses on Ocean Avenue. Map 1 indicates the boundaries of these areas.

USE OF THIS REPORT

The report on the Downtown, and all other issue reports, are divided into eight sections:

- (I) Summary of the Assignment (Includes Area Description)
- (II) Key Issues
- (III) Summary of Key Policy Findings
- (IV) Analysis -- Continuation of Past Policies
- (V) Analysis -- The Commercial and Industrial Task Force Program
- (VI) Analysis -- An Alternative
- (VII) Analysis -- Other Impacts of the Three Scenarios
- (VIII) Appendices

The reader should note that with respect to circulation questions, only the conclusions of the circulation analysis are reported here in the Summaries of Key Policy Findings. The detailed circulation data and analysis are contained in PRC Voorhes, "Santa Monica Circulation Analysis" Santa Monica Planning Commission, March 11, 1983.

As required by the Planning Commission, the analysis of the
phenomena is also to include an identification of the cause and
consequences that may reasonably be expected to attach to the
different sets of conditions with respect to the major city center.

- (1) A description of the physical features and resources for the
city and city services.
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- (3) A description of the physical features and resources for the
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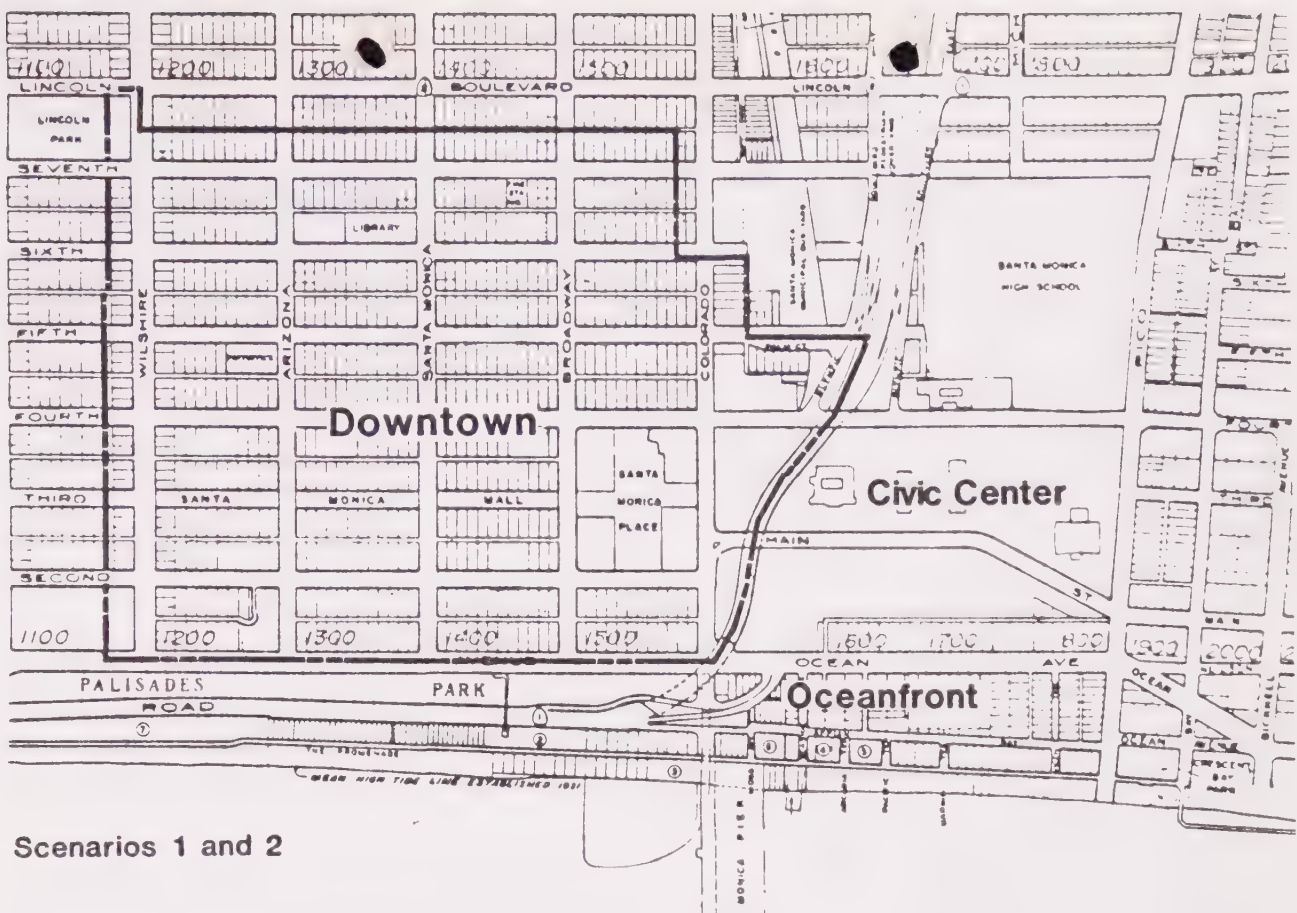
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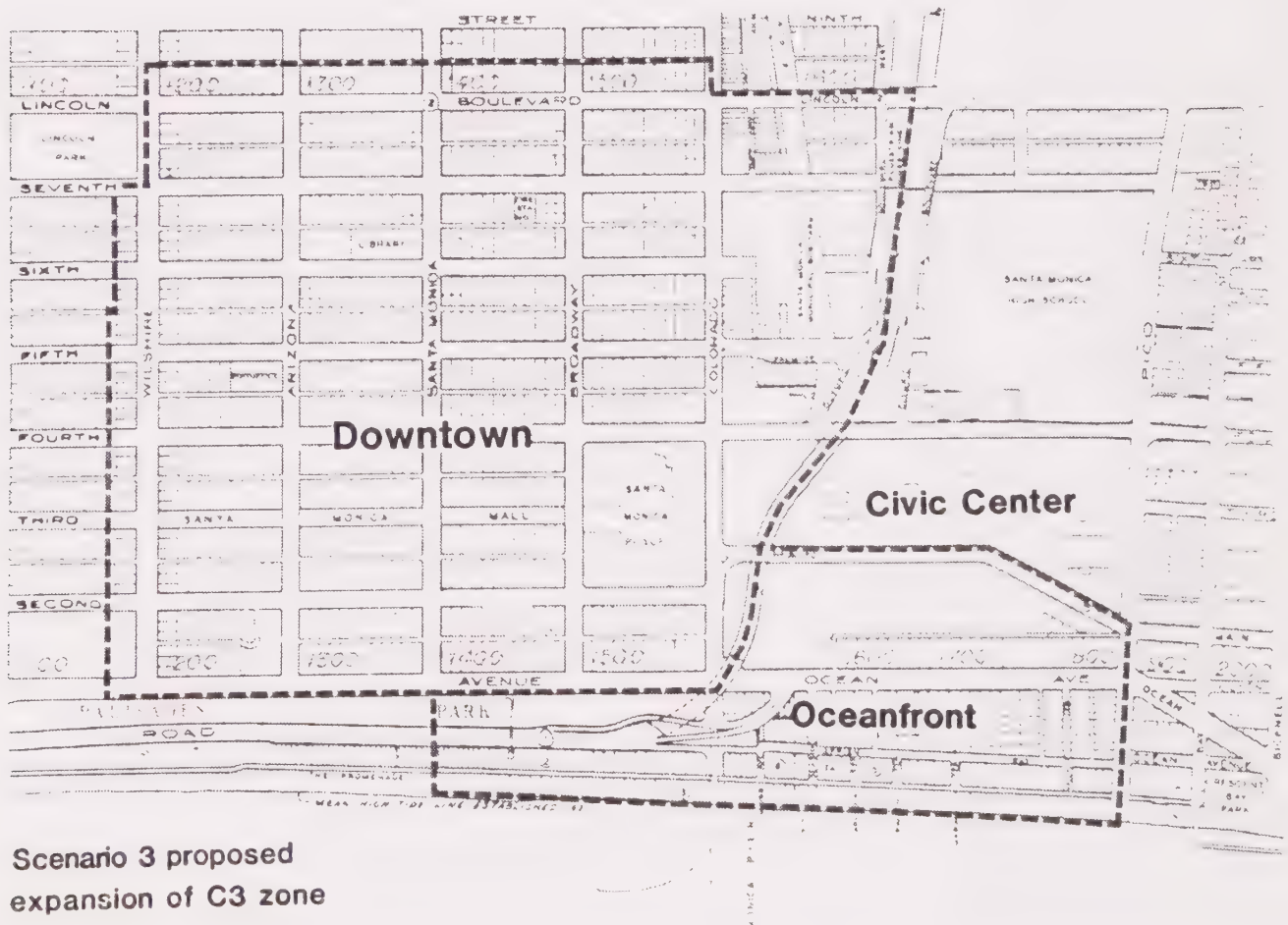
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Scenarios 1 and 2



Scenario 3 proposed expansion of C3 zone

Definition of Downtown Issue Area

These analyses are not proposed as a substitute for public debate of the key issues. They are intended as an aid to this debate. Each issue paper has been circulated to many groups in the City and will be presented at a public workshop where its findings will be described and written and oral comments solicited from the community. The workshop on the Downtown will be held on May 7, 1983.

The key decisions which a land use plan entails are the regulation of use, height, bulk, intensity and resulting circulation patterns. These are the action items on which consensus must be achieved. To highlight these items, the final appendix in each issue paper contrasts the specific regulations proposed for each scenario.

After all five workshops have been held and the fruits of public comments arising from them are digested, the Consultants will relate the findings for each area to the City-wide policy that will be expressed in the new Land Use and Circulation Element. If these perspectives reduce to a single basic approach, the approach will be translated into a draft Land Use Element, which will then again be circulated for public comment. Only after this extensive opportunity for public appraisal and advice will the package of policies selected by the City be put into finished form for submission to the City Planning Commission and the City Council.

KEY ISSUES

The key issues which must be decided with respect to the Downtown are twofold:

First, if the existing pattern of development continues without changes in regulations, what will be the circulation consequences for the Downtown?

Second, should the City impose requirements for less intensive use in the Downtown?

The second issue can be divided into three sub-questions:

- (1) If regulations for the Downtown in existence prior to the moratorium are not altered and the moratorium is lifted, what will the future configuration of the area be, with respect to traffic, circulation and the quality of life in the Downtown?
- (2) Is the imposition of low density land use and mixed use (residential/office and office/retail) requirements as contemplated by the Task Force such that development is likely to be economically viable for developers?
- (3) How can the Task Force goal of making the Downtown the focus of the City, by creating an environment that attracts people during the daytime and the evening, and encouraging a pedestrian orientation best be accomplished?

SUMMARY OF KEY POLICY FINDINGS

SCENARIO I: CONTINUATION OF PAST POLICIES

The Planning Director of the City reported in 1980 that by that year the City had added in the Downtown more than 1,350,000 square feet of development, or twice what planning consultants had estimated in 1977 would be developed there by 1990. In addition, he pointed out that the zoning allowed structures up to six stories with no floor area limitations, and that half the Downtown was within the Downtown Parking District. As such it could be developed to six times buildable area with no provision for off-street parking. He asked for a moratorium enacted until the traffic situation could be studied, but the Planning Commission did not recommend such a moratorium.

Since That Time and Up to 1982

- * A good deal of the expansion in the Downtown has been of office uses. Excluding the Airport Business Park, 26% of the new office growth in the City (643,900 sq. ft.) has been in the Downtown, as compared to 43% in the Industrial Corridor and 22% in the Wilshire/Santa Monica Corridor. If projects currently under construction in the Industrial Corridor, but not yet completed, are excluded, 32% of the new office growth in the City has been in the Downtown as compared to 29% in the Industrial Corridor and 28% in the Wilshire/Santa Monica Corridor.
- * Trends in retail use are harder to evaluate because while there has been a big increase, much of it is accounted for by the construction of the unique Santa Monica Place regional shopping center, a 476,000 square foot complex. Including this development, of the total of just over a million square feet of retail space added in the City since 1975, 60% went into the Downtown. (If the Place is excluded then Downtown had less retail expansion than did the Wilshire/Santa Monica Corridor.)
- * These two trends have produced a downtown commercial area at present which is occupied 44% by retail uses, and 56% by office uses (1,650 residential units, or 4% of the City's residential units, are also in the Downtown though residential uses are prohibited in the C3 zone). The commercial area figures exclude public buildings and parking structures.
- * Windshield surveys indicate that office growth has not produced a serious erosion of the availability of retail goods in the Downtown. While some retail uses have been replaced by offices and middle market retail goods (jeans, art galleries) much of the major preexisting retail space is still there. Of 29 buildings built in the Downtown, only seven replaced storefronts. And, at least seven of the new office buildings contain storefronts on the ground floor.

- * The increase in Downtown development has not improved the situation of the Santa Monica Mall within the Downtown. Once the retail center of the City, Third Street had a history of declining retail sales when it was converted into a pedestrian mall. It has continued to experience downturns in sales values and increases in the number of vacant stores. A number of the storefronts have been converted to office and other non-retail uses, eroding the pedestrian quality of the Mall.
- * Traffic in the Downtown is not currently at capacity.
- * In recent years, the pattern of one way streets in the Downtown has been revised by returning Arizona and Sixth Streets to two-way traffic flow. Channelization improvements and left turn prohibitions at certain intersections (most notably 4th/ Santa Monica) have eliminated previous congestion problems.

If Past Policies Are Continued, by the Year 2000 the Downtown Will:

- * The potential under existing law for severe overbuilding is great. The allowable height Downtown is six stories with no FAR restrictions. (Floor Area Ratio [FAR] compares the size of a building to the size of its lot.) Thus developers could put much larger buildings on their lots than they are currently doing unless existing regulations are modified. They do not do so because of the cost of providing parking and building and fire code requirements, as well as their evaluation of the marketability of the space. If developers build out to the maximum, in the City as a whole there would be a five fold increase in traffic, requiring 31 new six lane arterial streets overall. Since in fact developers in the Downtown are actually building only to an FAR of about 3.3 we assume below that they would continue to do so under this scenario. We call this FAR the "practical maximum".
- * Assuming the use of the practical maximum FAR, the Downtown will continue to contain somewhat more office than retail development. Twenty-seven percent of the new office growth in the City will be drawn into the Downtown, along with 50% of the new retail growth. By the year 2000 this means that there will be 1.05 million square feet of new office development in the Downtown and 853,000 square feet of new retail development. By the year 2000 the area is likely to contain 6,115,408 square feet of developed space, of which 55% will be office, and 45% retail.
- * The Santa Monica Mall will continue its past pattern of decreasing sales, increases in vacancies and appeal to a limited group of buyers, mainly low income and elderly, who live in the immediate area.

- * Within the Downtown grid pattern of streets, traffic will be fairly evenly distributed on all blocks. Several of the major approach routes into the Downtown are likely to become congested. These include the California Incline and Wilshire Boulevard East of 6th Street. Anticipated traffic problems on Lincoln Boulevard are discussed in the Issue Paper on the Highway Commercial Corridors. No other capacity problems are anticipated within the Downtown under this scenario. Note that this analysis assumes the 4th St. on ramp to the eastbound Santa Monica freeway will be constructed by the year 2000. Since three of the major access routes to Downtown will be congested, traffic is likely to be diverted to alternate routes.
- * The visual effect in Downtown is likely to be one of unarticulated elevations and boxlike building forms whose exterior skin and materials are insensitive to the existing context and which contribute little to the pedestrian activity on the street, and cause excessive shading of sidewalks during winter months.

SCENARIO II: THE COMMERCIAL AND INDUSTRIAL TASK FORCE PROGRAM

Policy Changes Recommended

In 1981 the City's Commercial and Industrial Task Force reviewed the situation of the Downtown area and recommended that the scale of development in the area be reduced and some areas be rezoned residential. In March, 1982, in a further study, the Task Force adjusted these regulations to increase allowable bulk and height over their prior recommendation, but continued to emphasize the need to promote activities in the Downtown which attract people to the area at all times of day and evening, and a pedestrian orientation by encouraging ground level amenities and active uses. Residential uses were allowed above the first floor of Downtown buildings. The goal of both recommendations was to turn the Downtown into the focus of the City and to make it a focus area not only for business but also for cultural and residential activities.

Consequences

- * Despite the reduction in developable space in the Downtown implied by the Task Force policies, there is still sufficient space susceptible to change to accommodate the office and retail demand forecast in the first scenario for this area to the year 2000.
- * The lower height, FAR and mixed retail/office requirements imposed would, however, cause the return on equity of a typical project in the Downtown to drop 3% compared to the return if past policies were continued. This change would ultimately be

reflected in a 19% decrease in land value. When the decrease had taken place, land would be redeveloped but the profit to the landowner would be decreased. This process is described in Appendices I and II.

- * This decline might be experienced as a loss on book value of the land by land owners who paid more for their Downtown land than the value available after the downzoning had taken place. The decline, however, is not likely to produce a loss for landowners purchasing prior to 1978.

If The Recommended Task Force Policy Changes Are Adopted, by the Year 2000 the Downtown Will:

- * If the limitations on height and bulk in the Task Force recommendations were adopted, the Downtown would likely contain the same amount and distribution of development as if present policies were continued.
- * The changed regulations would alter the typical forms of development. They would encourage developers to build out to property lines at ground level and to include ground floor retail development. It is also likely that most projects would incorporate below grade parking because it is not calculated in allowable floor area ratio. Both these changes would produce a more pleasant and pedestrian oriented environment.
- * However, the housing anticipated by Task Force regulations is not likely to be built except in high amenity locations such as along Ocean Avenue.
- * In addition, the prototypical building likely to be produced under Task Force guidelines is less likely to achieve the goals of producing sunlit sidewalks and a low scale facade as perceived by pedestrians, than is a set of design requirements combined with higher height limits. The fifty foot setback at the 4th floor level envisioned by the Task Force rules in several areas would result in wide expanses of unsightly and unusable roof space. Without design guidelines, buildings at three stories could be just as insensitive to their context as those under current regulations.
- * These regulations succeed in tailoring development potential better than the existing rules, but they may not in themselves be sufficient to lead to variety and innovation in design by developers and architects.
- * The traffic situation would be very close to the same as if current policies were continued because the amount of development Downtown would be the same. Again, it is assumed the 4th St. ramp will be constructed and capacity problems will begin to occur on three of the major access routes to Downtown -- Lincoln, Wilshire and the California Incline.

SCENARIO III: AN ALTERNATIVE

Policy Changes Recommended

A modified set of policies is put forward here which seeks to accommodate development in the Downtown in a way that fosters the beneficial effects of growth. These involve more intense levels of activity, revitalization of the Mall, a concentration of development in areas well served by public transportation, and increasing ability to attract visitors, while minimizing the harmful effects of traffic congestion, loss of human scale and the incursion of office development into residential areas.

This alternative attempts to concentrate as much office development, some diverted from the Industrial Corridor, in the Downtown as possible. Office development here would be in buildings which were smaller in floor area than in the Industrial Corridor. The allowable scale of office buildings would be based on urban design criteria for sunlit sidewalks, pedestrian/street level activity and perceived mass at street level. The criteria are illustrated in the descriptions of seven sets of principles, which follow.

An average FAR of 3 would be allowed for all new construction. Building heights would be three stories at the street frontage and up to 75 feet (6 stories) in the rear of the parcel, determined by criteria which promote sunlight on the sidewalk.

Retail development, focused on comparison goods shopping, would also be concentrated in the Downtown. It would be required that 75% of ground floor frontage (with a minimum 20 foot depth) be devoted to retail or pedestrian oriented uses.

In addition, residential uses would be permitted in the C3 district above the first floor.

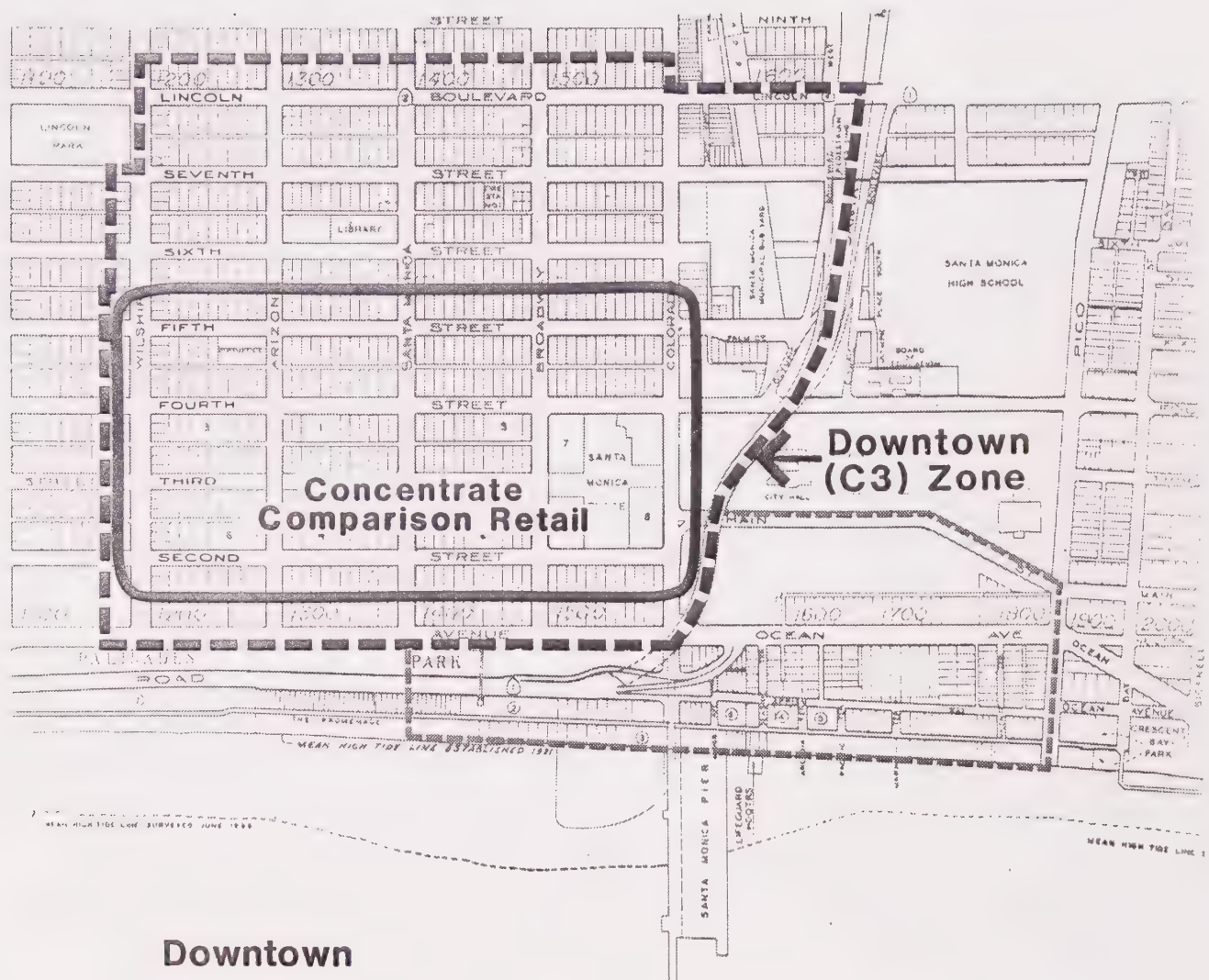
Consequences

- * These guidelines are more likely to produce a Downtown, including the Mall, which is the active focus of the City, while minimizing harmful effects on the pleasant, low scale environment and on the traffic/parking system, than either Task Force or current policies. The added height will have no harmful effect on ground level perception of the street facade or on the amount of sun reaching the street.
- * Existing residential areas in the Downtown are likely to remain. However, new market rate housing is only likely on Ocean Avenue due to the presence of amenities necessary to attract residential use here.

- * The traffic and circulation consequences of this Downtown development scheme are similar to the other two scenarios. Traffic volumes would be approximately 1-5% higher on most streets because of hotel trips generated in the nearby Oceanfront area. Congestion would result on the same streets providing access to Downtown as it would in the other two scenarios. Only Ocean Avenue would experience a noticeable difference in traffic volumes under this scenario, but because most of the additional trips added by this scenario are hotel-generated trips which occur at off-peak hours, no significant change in peak hour levels of congestion is anticipated.
- * The Circulation Element will recommend creation of a loop route for buses through Downtown which would utilize Wilshire, 2nd, Colorado and 6th Streets to make them major transit corridors and focus transit in the Downtown. This will improve transfer and the ease of bus access.
- * The major effect of slightly modified development standards is to allow an outlet for development pressure from the Broadway area, where the potential harmful effects of office intrusion on adjacent neighborhoods are great.

If the Alternative Policy Changes Are Adopted, by the Year 2000 the Downtown Will:

- * Under this scenario it is likely that by the year 2000, the area would contain more than 2 million additional square feet of developed space, 210,000 more than either the baseline or second scenario could accommodate. The extra development would occur in the eastern half of the Downtown, through increasing allowable FAR in those districts from 1.5 to 3.0. This would produce a Downtown which is 45% retail and 55% office.



Downtown

LAND USE

PRINCIPLE: Create an image for Downtown as the focus of the city--the greatest concentration of activity, and the heart of the community.

MEANS:

- Concentrate comparison retail use near the Mall, as indicated above.
- Direct general office space to the Downtown, provided it meets goals concerning environmental impacts and urban design (see Urban Design and Development Standards).
- Permit residential development and visitor accommodations in the Downtown, to help create activity at all times of the day and evening, and provide a market for additional retail.
- Recognizing the special importance of the Mall, prepare a specific area plan for its future improvement.

Not This. . .



or This. . .



but This. . .



Downtown

URBAN DESIGN AND DEVELOPMENT STANDARDS

PRINCIPLE: Require materials and colors appropriate to Santa Monica's scale and image.

MEANS:

- Encourage light-colored buildings, and materials that fit in with the existing context. Reinforce Santa Monica's existing image, reminiscent of a Mediterranean town or a low-scale "beach community."
- Prohibit reflective or black glass fenestration and other dark tones and materials.



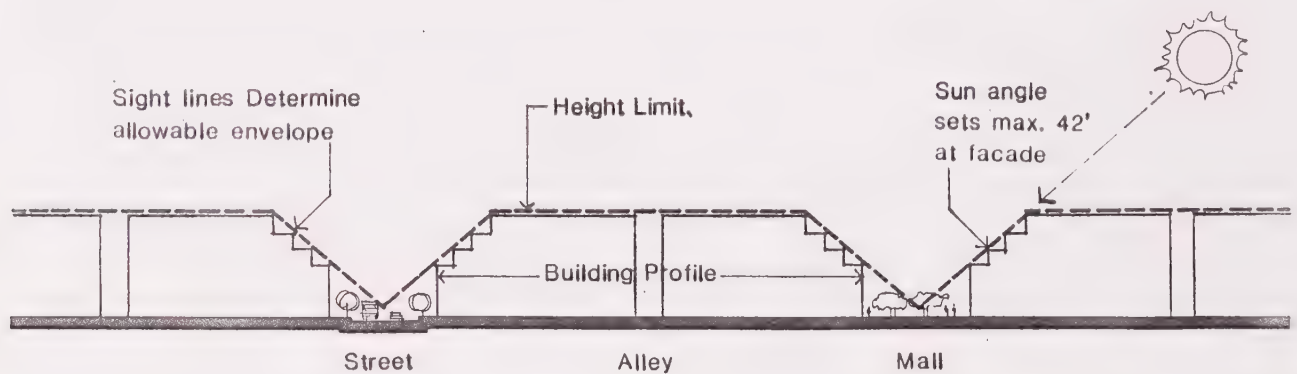
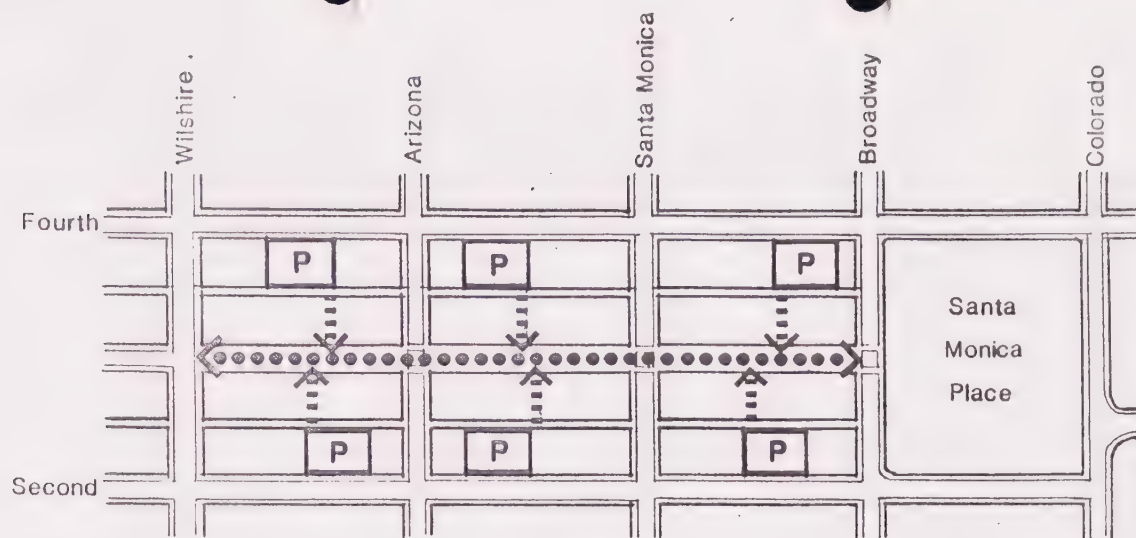
Downtown

URBAN DESIGN AND DEVELOPMENT STANDARDS

PRINCIPLE: Protect a sense of pedestrian scale and walkability in Downtown.

MEANS:

- Establish height limits determined by solar access and ground-level perception of building mass (see section next page).
- Require that 75 percent of ground floor street frontage per block be active use (shopfronts, cultural activities, cafes, and other pedestrian-oriented uses).
- Establish guidelines to ensure continuity of sidewalks and provision of pedestrian amenities (awnings, arcades, frequent entrances and windows, etc.)
- Require building facades to be built to the street front property line. Any parking at street frontage to be screened behind landscaped walls.
- Encourage design articulation of such features as cornices, columns, and entrances. (Consider requiring articulation every 50 feet of street frontage, to express the standard parcel width.)
- Develop guidelines to encourage high-quality design and consistent placement of signage and advertisement.



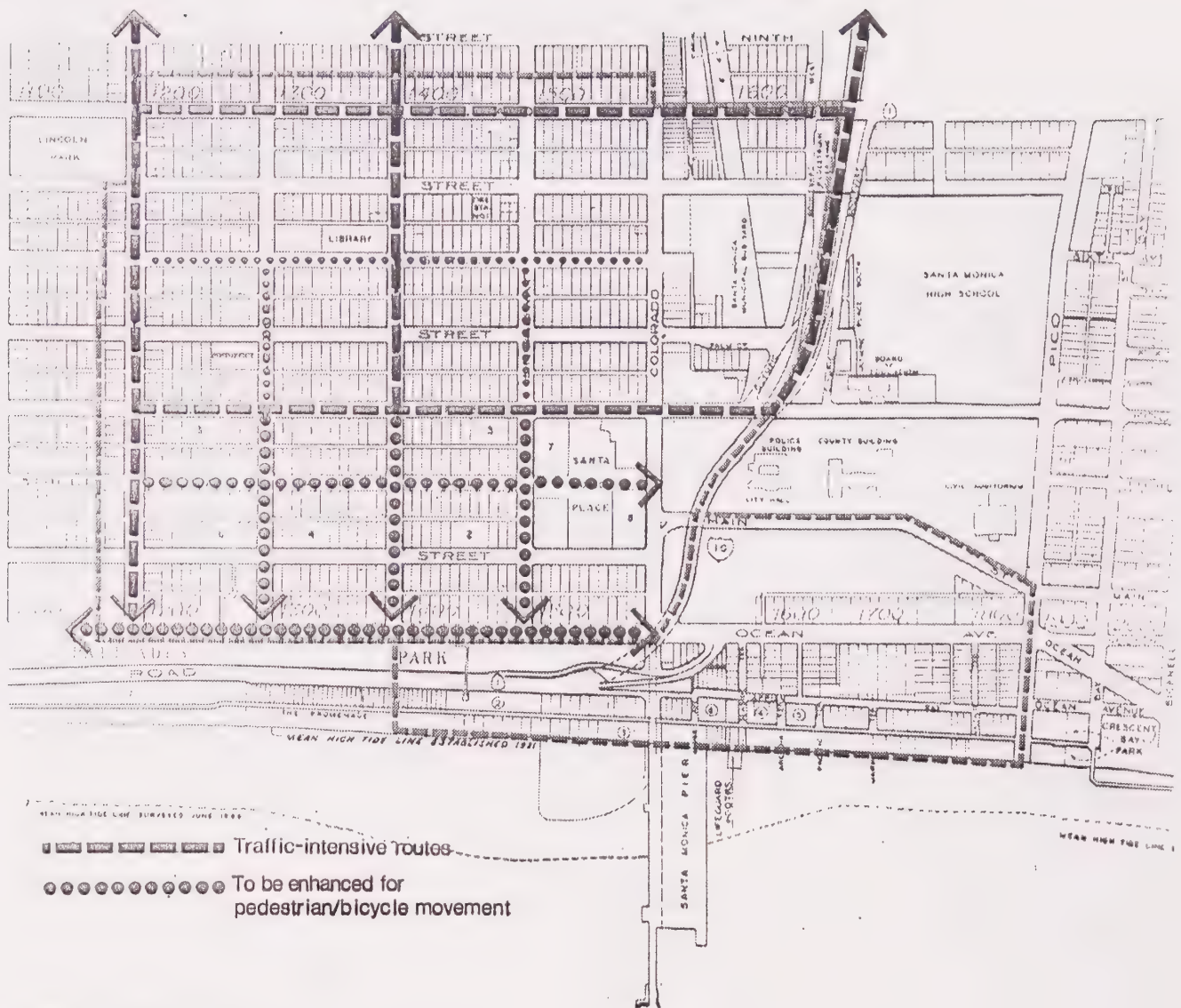
Downtown

URBAN DESIGN AND DEVELOPMENT STANDARDS

PRINCIPLE: Enhance and revitalize Santa Monica Mall by upgrading of existing uses, and by new development sensitive to the existing context.

MEANS:

- Improve access from parking garages to the Mall, possibly by means of "paseos" or through-block arcades.
- Establish lower allowable height at Mall facade, to protect pedestrian scale, rising to allow higher development at rear of parcel (see section).
- Set allowable building envelope determined by sight lines from center of street (or Mall).
- Other standards to be developed as part of a Downtown or Mall Specific Plan.



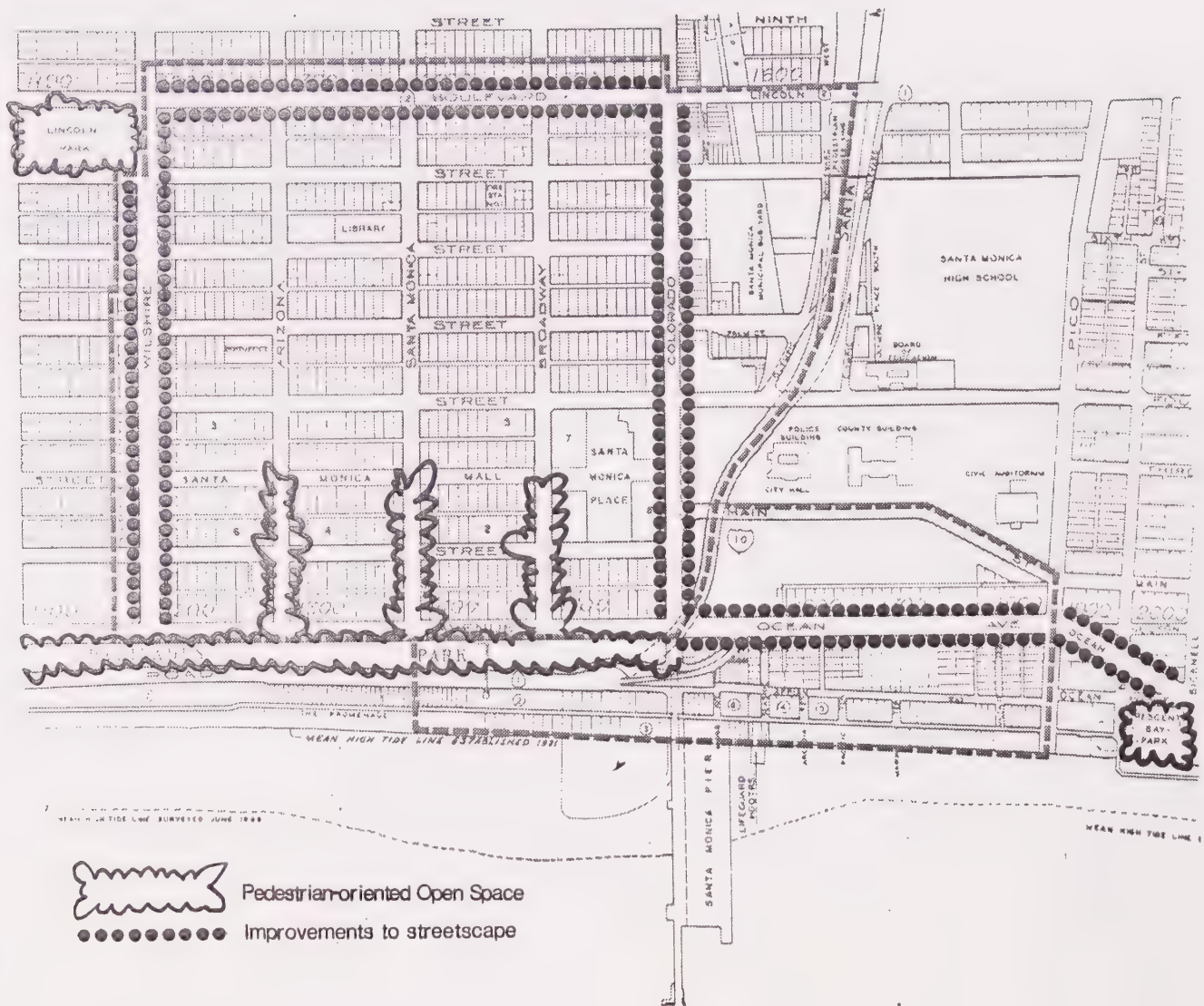
Downtown

CIRCULATION/STREETSCAPE

PRINCIPLE: Distinguish by streetscape design two interwoven networks of streets--one traffic-intensive, and the other to be enhanced for pedestrian and bicycle movement.

MEANS:

- Identify direct freeway access routes and other high-traffic streets (4th, Lincoln, Wilshire, Santa Monica).
- Identify low-volume streets (the Mall, Arizona, Broadway, 6th Street) as high priority areas for improved sidewalks/bikelanes, and road narrowing to provide parking bays or landscaping.
- Prohibit driveway curb cuts on principal pedestrian and east-west streets; generally encourage parking access from alleys.



Downtown

PUBLIC SPACE

PRINCIPLE: Use streetscape to create a recognizable "frame" signaling arrival in the Downtown, and to reinforce its connection to Palisades Park and the Oceanfront.

MEANS:

- Landscape improvements to Ocean, Wilshire, Colorado, and Lincoln.
- Emphasis on Ocean Avenue as a strong link between Downtown and the Oceanfront/Civic Center district.
- Landscape improvements to east-west streets between the Mall and Palisades Park, as discussed under Circulation/Streetscape.
- Establish new public graphics and street furniture system.

ANALYSIS -- OTHER IMPACTS OF THE THREE
SCENARIOS

The analysis of the Downtown alternatives has primarily focused on the goal of achieving a vibrant and pedestrian scale downtown and on the implications of these alternatives for the demand for space of different types and consequently for land values. Below a comparison is made of all six goals about which the City has concerns, although for decision on this issue the key concern seems to be the creation of a built environment which strengthens commerce and cultural and civic activities in the Downtown, and encourages revitalization of declining areas within it.

<u>SCENARIOS</u>			
<u>CITY GOAL</u>	<u>CONTINUATION</u>	<u>TASK FORCE</u>	<u>ALTERNATIVE</u>
Costs & Revenues (in constant 1982 dollars)	Results in a revenue increase of \$2.5 million and a cost increase of \$2.2 million from current conditions. Based on year 2000 development patterns, total revenues exceed total costs by \$2.2 million.	Results in a revenue increase of \$2.4 million and a cost increase of \$2.4 million from current conditions. Based on year 2000 development patterns, total revenues exceed total costs by \$2.0 million.	Results in a revenue increase of \$3.3 million and a cost increase of \$2.4 million from current conditions. Based on year 2000 development patterns, total revenues exceed total costs by \$2.8 million.
Support for Small/Locally Owned Business	Likely to not be very supportive due to lack of building design standards which would enhance the pedestrian environment.	Same as the first scenario.	Likely to be the most supportive due to specific design standards to enhance the pedestrian environment, and contains the most retail space of the three scenarios.

<u>CITY GOAL</u>	<u>CONTINUATION</u>	<u>TASK FORCE</u>	<u>ALTERNATIVE</u>
Housing	Encroachment into residential areas of office uses likely.	Not likely to generate desired housing.	Residential areas enabled.
The Environment	Unarticulated elevations, insensitive, blocks sunlight on the street.	Does tailor height and bulk more. Inhibits design innovation. Too rigid.	Protects sunlight to public space, low-scale perceived mass, active pedestrian environment
Un-under-Employment	An increase of 2700 jobs for Santa Monica residents by the year 2000 from current levels.	Essentially no change from the first scenario.	An increase of almost 3000 jobs, from current levels, 11% more than under the first or second scenarios, for Santa Monica residents by the year 2000.
Employment	Generates 26,800 jobs by the year 2000 in the Downtown; an increase of 9,100 jobs (51%) from current levels.	No change from first scenario.	Generates 27,700 jobs by the year 2000 in the Downtown; an increase of 10,000 (57%) from current levels, or 900 jobs (3%) more than under the other scenarios.

SUMMARY COMPARISON OF SCENARIOS -- THE DOWNTOWN

<u>Zone</u>	<u>Comparison Category</u>	<u>Continuation</u>	<u>March Task Force</u>	<u>Alternative</u>
C3				
	Height FAR	6 stories (90') 6.0(effective FAR)		
	Height FAR		<u>Sub-Area A</u> 3 stories 2.0	<u>Ocean Avenue</u> 75'(solar envelope) 2.0
	Height FAR		<u>Sub-Area B</u> 3 stories 3.0	<u>2nd Street</u> 75'(solar envelope) 3.0
	Height FAR		<u>Sub-Area C</u> 3-4 stories 3.0	<u>S.M. Mall</u> 75'(solar envelope) 2.0
	Height FAR		<u>Sub-Area D</u> 4-6 stories 2.5-4.0	<u>Sub-Area D</u> 75'(solar envelope) 3.0
	Height FAR		<u>Sub-Areas E&F</u> 3-6 stories 1.5	<u>Sub-Areas E&F</u> 75'(solar envelope) 3.0
	Height FAR		<u>Sub-Area G</u> 4 stories 3.0	<u>Sub-Area G</u> 75'(solar envelope) 3.0
	Height FAR		<u>Sub-Area H</u> Unstated Unstated	<u>Sub-Area H</u> 75'(solar envelope) 3.0
Residential		Above 3rd floor only	Above first floor	Above first floor

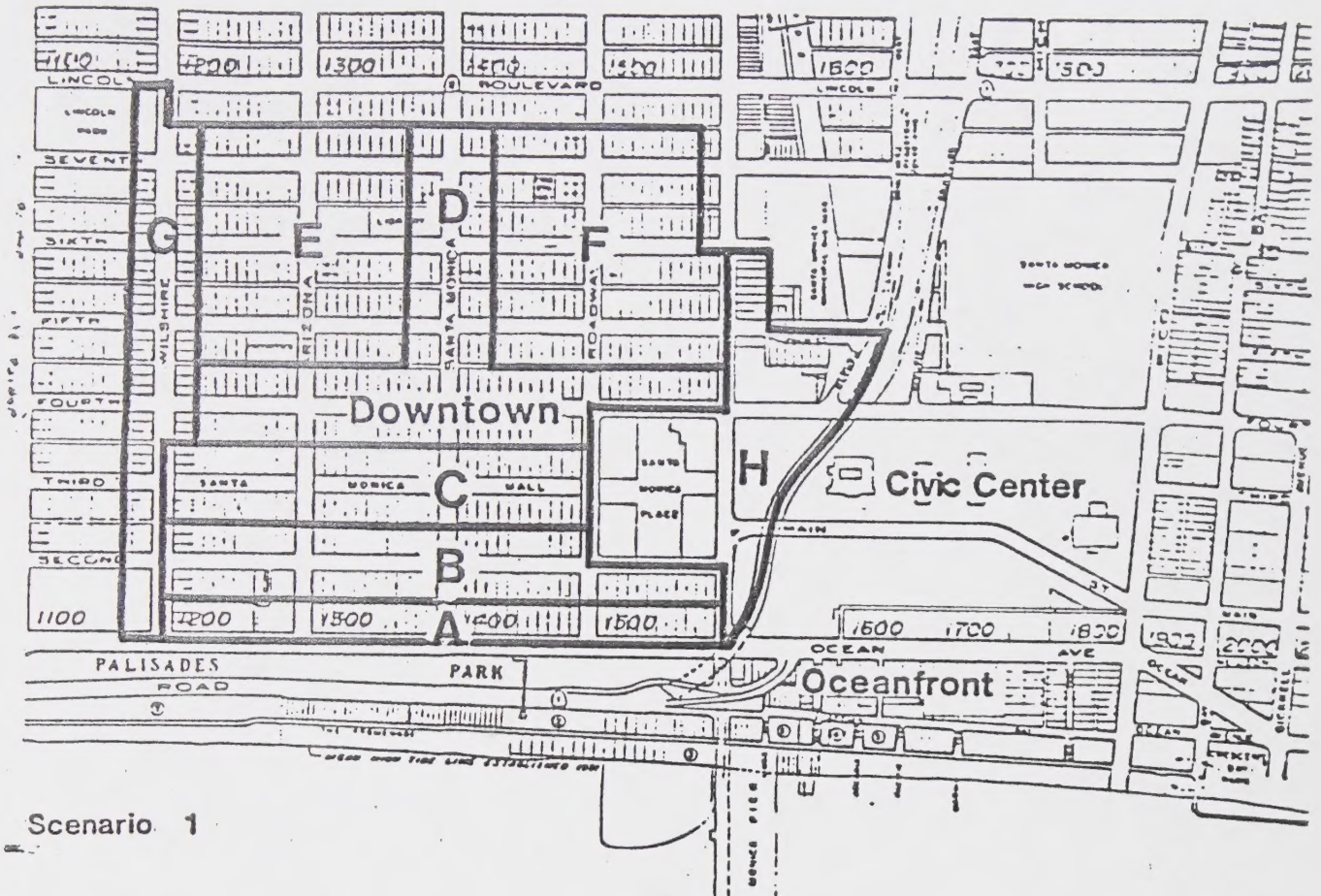


GENERAL INFORMATION			
NAME	DATE	TIME	LOCATION
1. NAME	2. DATE	3. TIME	4. LOCATION
5. NAME	6. DATE	7. TIME	8. LOCATION
9. NAME	10. DATE	11. TIME	12. LOCATION
13. NAME	14. DATE	15. TIME	16. LOCATION
17. NAME	18. DATE	19. TIME	20. LOCATION
21. NAME	22. DATE	23. TIME	24. LOCATION
25. NAME	26. DATE	27. TIME	28. LOCATION
29. NAME	30. DATE	31. TIME	32. LOCATION
33. NAME	34. DATE	35. TIME	36. LOCATION
37. NAME	38. DATE	39. TIME	40. LOCATION
41. NAME	42. DATE	43. TIME	44. LOCATION
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93. NAME	94. DATE	95. TIME	96. LOCATION
97. NAME	98. DATE	99. TIME	100. LOCATION

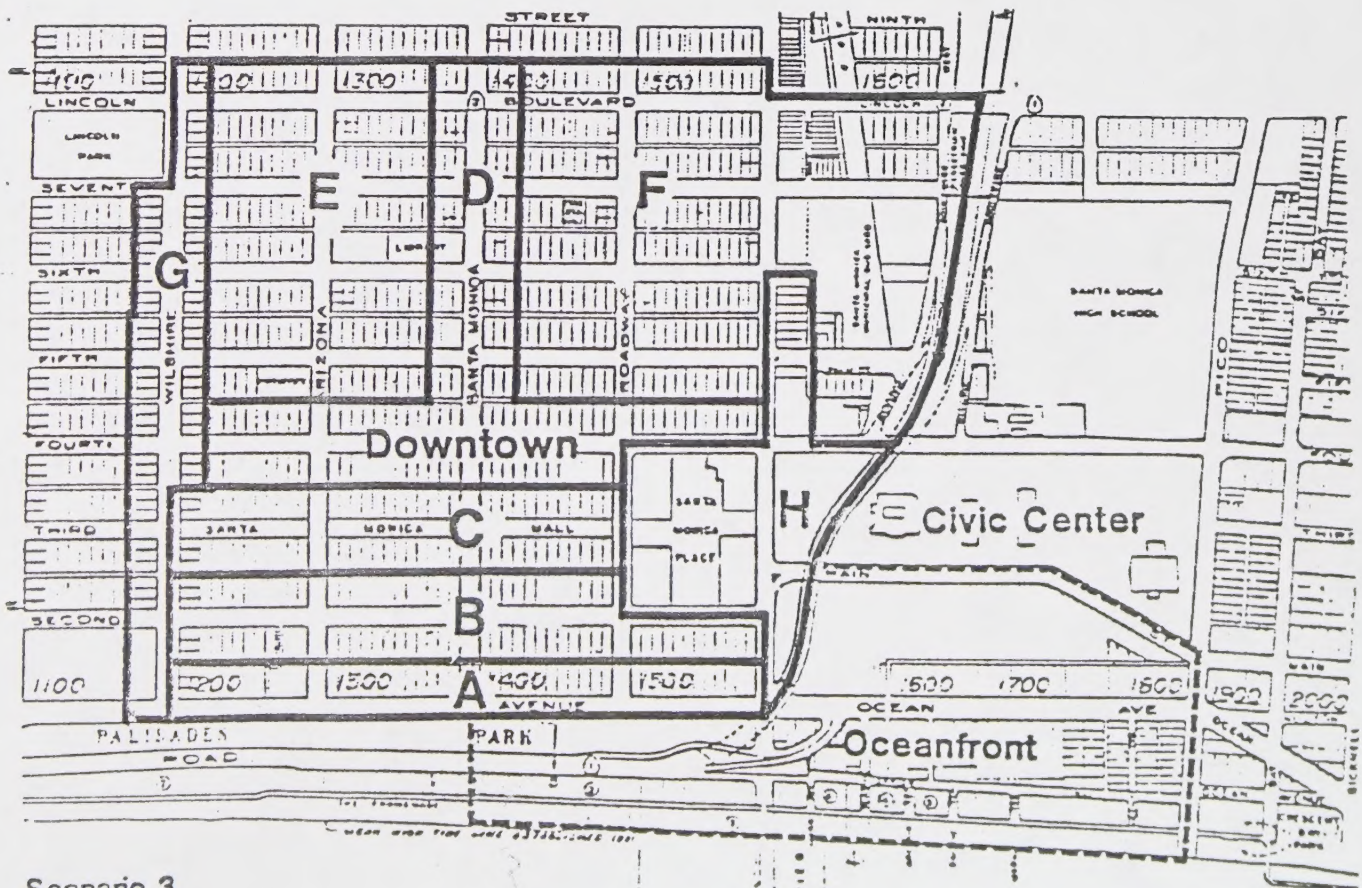
LEGEND FOR APPENDIX III

(Revised May 2, 1983)

Downtown Sub Areas



Scenario 1



Scenario 3



C123300475

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DOWNTOWN DISTRICT

